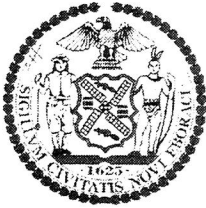


EXHIBIT C



Eric Gonzalez
District Attorney

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March 5, 2021

VIA REGULAR MAIL

Mirel Fisch, Esq.
The Law Offices of Anthony M. Grandinette
114 Old Country Road, Suite 420
Mineola, NY 11501

**Re: O'Hara v. City of New York, et al.
E.D.N.Y. docket no. 17-cv-4766
RESPONSE TO SUBPOENA**

Dear Ms. Fisch.

Please accept this correspondence, and attached records, as the Kings County District Attorney's response to your subpoena. Specifically, you have subpoenaed "[a] complete copy of the Kings County District Attorney's Office's Conviction Review Unit's file pertaining to its investigation into the matter entitled People of the State of New York v. John O'Hara, Indictment No. 13525/1996. . . ." In total, four-hundred and nineteen (419) pages are being produced.¹

Records responsive to your request are enclosed herein, with the following exceptions:

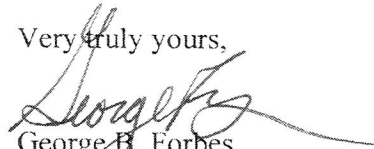
PRIVILEGE LOG

Bates No.	Date	Author	Recipient	Privileges	Description
1046 – 1048	Feb. 2, 2015	James M. Bernard, Esq.	Kenneth P. Thompson, Esq.	Attorney-Client privilege	Retainer agreement that contains therein a confidential communication of legal advice.
1141 – 1161	June 10, 2016	Jerry H. Goldfeder, Esq.	Mark Hale, Esq.	Attorney-Client privilege; Attorney-Work Product privilege	Memorandum of law from attorney to client analyzing purported election law violations in <u>People v. O'Hara</u> , Kings Co. Ind. No. 13525/96.

¹ The bates numbers are consistent with the prior production of 718 pages.

Kings County District Attorney's Office
(E.D.N.Y., docket no. 17-cv-4766; Response to Subpoena)
Page 2 of 2

Very truly yours,



George B. Forbes

GBF/